

1. THE HONORABLE LAUREN KING
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7. UNITED STATES OF DISTRICT COURT
8. WESTERN DISTRICT OF WASHINGTON AT SEATTLE
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10. LEO'S WELDING and FABRICATION,
11. LLC, a Washington limited liability company

12. Case No. 2:25-cv-00625 LK

13. Plaintiffs,

14. v.

15. HANNAH, Official Number 1067457, her
16. machinery, engines, equipment, cargo
17. appurtenances, *in rem* and SAYAK
18. LOGISTICS, LLC, an Alaska limited liability
19. company dba NORTHLINE SEAFOODS *in
20. personam*

21. Defendants.

22. ANSWER TO AMENDED
23. COMPLAINT AND AFFIRMATIVE
24. DEFENSES

25. COMES NOW defendant SAYAK LOGISTICS, LLC ("Defendant"), and by way
26. of its Answer and Affirmative Defenses to the Amended Complaint of plaintiff LEO'S
WELDING and FABRICATION, LLC, admits, denies, and alleges in like-numbered
paragraphs as follows:

27. 1. Paragraph 1 states legal conclusions and therefore no admission or denial
28. is required.

29. 2. Defendant is without sufficient information to admit or deny Paragraph 2

30. ANSWER TO AMENDED COMPLAINT AND
31. AFFIRMATIVE DEFENSES - 1
32. Case No. 2:25-cv-00625LK

33. HOLMES WEDDLE & BARCOTT, PC
34. 3101 WESTERN AVENUE, SUITE 500
35. SEATTLE, WA 98121
36. TELEPHONE (206) 292-8008 | FAX (206) 340-0289

1. and therefore denies the same.

2. 3. Admitted.

3. 4. Admitted.

4. 5. Admitted.

5. 6. Admitted.

6. 7. Admitted that Plaintiff's Customer Statement is attached as Exhibit 2. All
7. other averments of Paragraph 7 are denied.

8. 8. Denied.

9. 9. Admitted that Plaintiff filed a lien that is attached as Exhibit 3. All other
10. averments of Paragraph 9 are denied.

11. 10. Denied.

12. 11. Paragraph 11 states a legal conclusion and therefore no admission or
13. denial is required.

AFFIRMATIVE DEFENSES

14. By way of further Answer and for its Affirmative Defenses to Plaintiff's
15. Complaint, Defendant states:

16. 1. Failure to state a claim upon which relief can be granted.

17. 2. Such other defenses as may be discovered during discovery.

PRAYER FOR RELIEF

18. WHEREFORE, for the above-stated reasons, Defendant prays for the following:

19. 1. For entry of Judgment against Plaintiff and in favor of Defendant and for
20. dismissal of Plaintiff's claims with prejudice;

21. ANSWER TO AMENDED COMPLAINT AND
22. AFFIRMATIVE DEFENSES - 2
23. Case No. 2:25-cv-00625-LK

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2. For entry of Judgment in favor of Defendant and against Plaintiff for all damages caused by Plaintiff's breach of contract with Defendant;

3. For a declaration that the HANNAH is not subject to the lien claim Plaintiff has failed against the vessel;

6. 4. For an award of attorney's fees and costs in favor of Defendant and
7. against Plaintiff under the terms of the parties' agreement.

8. 5. For such other relief as the Court may deem just and equitable.

DATED this 13th day of May, 2025.

HOLMES WEDDLE & BARCOTT, P.C.

/s/ Michael A. Barcott
Michael A. Barcott, WSBA #13317

/s/ John E. Casperson

/s/ Daniel P. Barcott
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Attorneys for Defendant Sayak Logistics,
LLC d.b.a. Northline Seafoods

**ANSWER TO AMENDED COMPLAINT AND
AFFIRMATIVE DEFENSES - 3**
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1. CERTIFICATE OF SERVICE

2. The undersigned certifies under penalty of perjury
of the laws of the State of Washington that, on the
3. 13th day of May 2025, the foregoing was electronically
4. filed with the Clerk of Court using the CM/ECF system,
which will send notification of such filing to the following:

5. Attorneys for Plaintiff:

Brian C. Zuanich, WSBA #43877 - brian@zuanichlaw.com
6. Robert Zuanich, WSBA #9581- rpz@zuanichlaw.com
Zuanich Law PLLC
7. U.S. Bank Center
1420 5th Avenue, Suite 2200
8. Seattle, WA 98101

9. *Alegria S Forman*

10. Alegria S. Forman

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ANSWER TO AMENDED COMPLAINT AND
AFFIRMATIVE DEFENSES - 4
Case No. 2:25-cv-00625LK

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